## STATE OF NEW MEXICO COUNTY OF LOS ALAMOS

IN RE INNCORPORATED COUNTY OF LOS ALAMOS RESOLUTION NO. 21-30

A RESOLUTION DECLARING THE HOTEL STRUCTURE, COMMONLY REFERRED TO AS "THE HILLTOP HOUSE," LOCATED AT 400 TRINITY DRIVE, LOS ALAMOS, NEW MEXICO, A MENACE TO THE PUBLIC COMFORT, HEALTH, PEACE, AND SAFETY AND ORDERING REMOVAL OF THE HILLTOP HOUSE, AND ASSOCIATED RUINS, RUBBISH, WRECKAGE, AND DEBRIS FROM LOS ALAMOS COUNTY.

## OBJECTION AND REQUEST FOR HEARING

To: Los Alamos County Clerk, Naomi Maestas 1000 Central Avenue, Suite 240, Los Alamos NM 87547

New Mexico Innovation Triangle, LLC, whose address is 4001 Indian School Rd., NE, Albuquerque, NM 87110 ("NMIT"), by and through its undersigned attorneys SOMMER KARNES & ASSOCIATES LLC, as the owner of the real property located at 400 Ttinity Drive, Los Alamos, NM 87547 ("Property"), pursuant to NMSA 1978 § 3-18-5C, hereby objects to the Resolution No. 21-30 passed by the Los Alamos County Council on October 29, 2021, and hereby request as hearing as provided for by Section 3-18-5C.

Respectfully submitted,

Sommer Karnes & Associates LLP Attorneys for NMIT By: <u>/s/ Karl H. Sommer</u> Karl H. Sommer

khs@sommerkarnes.com 125 Lincoln Ave, Suite 221 Santa Fe, New Mexico 87501 Telephone: (505) 989-3800

## Sommer Karnes & Associates, LLP

Street Address 125 Lincoln Ave. Suite 221 Santa Fe, New Mexico 87501

Mailing Address Post Office Box 2476 Santa Fe, New Mexico 87504-2476

Telephone: (505) 989.3800 Facsimile: (505) 288-3601 Email: khs@sommerkarnes.com

## **MESSENGER REQUEST FORM**

Requested by:	Jue	Juella Montoya							
Client/Matter II	):	Mahoney & Rizzo							
Deadline Date:	11/0	8/21				Rush Job	Rush Job:		
Deliver	Pick	Pick-up		File		Record		Other	
District Court	sw	SW Title		America Surety	an	Copy Shack		County Clerk	
Court of Appeals	PRO	PRC		Sec. of State		Other		Check Attached	
Please hand deliver envelope to Los Alamos County Clerk Naomi Maestas at 1000 Central Avenue, Suite 240 Los Alamos, NM 87544. Thank you!!									
Please call if unable to complete					Okay to leave package if no answer				
Billing Entry:									
Indicate if you want return of request form indicating date, time and signature of person accepting delivery:									
Date: 11/08/21 Time: 1:24 Signature: 40nil							1.	sac St	af